

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

AMY HEINTZMAN,)	CASE NO. 1:20-cv-00409
)	
Plaintiff,)	Hon. Michael R. Barrett
)	
vs.)	
)	
INTEGRA LIFESCIENCES)	
CORPORATION,)	
)	
Defendant.)	

**DEFENDANT INTEGRA LIFESCIENCES CORPORATION'S MOTION
FOR SUBSTITUTION OF TRIAL ATTORNEY**

Defendant Integra LifeSciences Corporation respectfully moves this Court to substitute Sarah E. Bouchard, who has already been admitted *pro hac vice*, as Trial Attorney for the undersigned counsel pursuant to Local Rule 83.4(a) and (c)(2). In support of this Motion, Defendant Integra LifeSciences Corporation respectfully submits the accompanying memorandum. A proposed order is attached for the Court's consideration.

MORGAN, LEWIS & BOCKIUS LLP

Dated: August 7, 2020

BY: s/ Andrew J. Barber

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INTEGRA LIFESCIENCES)	
CORPORATION)	
)	
Defendant.)	

**MEMORANDUM IN SUPPORT OF DEFENDANT’S MOTION FOR
SUBSTITUTION OF TRIAL ATTORNEY**

Defendant Integra LifeSciences Corporation respectfully moves this Court to substitute Sarah E. Bouchard, who has already been admitted *pro hac vice*, as Trial Attorney for the undersigned counsel pursuant to Local Rule 83.4(a). Because Ms. Bouchard has expertise in the area of employment discrimination litigation, there is good cause to support this motion. *See High 5 Sportswear, Inc. v. High 5 Gear, Inc.*, No. 3:15-CV-401, 2016 WL 740325, *1 (S.D. Ohio Feb. 25, 2016) (finding good cause where *pro hac vice* counsel demonstrated expertise in the applicable area of law).

Ms. Bouchard, partner at Morgan Lewis, has 25 years of experience in employment litigation, including as a seasoned litigator with first- and second-chair trial experience in numerous employment-related matters. She has represented employers in state and federal courts and has arbitrated employment cases before various tribunals. *See Sarah E. Bouchard*, Morgan Lewis: Our People, <https://www.morganlewis.com/bios/sbouchard> (last visited Aug. 4, 2020). She regularly provides advice regarding compliance with Title VII and investigates claims of discrimination and harassment under Title VII. *Id.* Ms. Bouchard is the managing partner of Morgan, Lewis & Bockius’ Philadelphia office.

In addition to her litigation experience, Ms. Bouchard has been included on *Human Resources Executive's* "Most Powerful Employment Attorneys" list for the past nine years and was named a Leading Lawyer by *The Legal 500* since 2018.

Because Ms. Bouchard has demonstrated expertise in employment discrimination litigation—the area of law germane to this case—this Court should permit her to act as Trial Attorney for Defendant Integra LifeSciences Corporation. Ms. Bouchard is competent and capable of performing the duties of Trial Attorney established by Local Rule 83.4(a). Additionally, a permanent member of the bar of this Court, Andrew J. Barber, will continue to represent Defendant Integra LifeSciences Corporation in this case. For all these reasons, this Court should grant this Motion.

MORGAN, LEWIS & BOCKIUS LLP

Dated: August 7, 2020

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CERTIFICATE OF SERVICE

I hereby certify that, on the 7th day of August, 2020, I caused a true and correct copy of the foregoing *Motion for Substitution of Trial Attorney* on behalf of Defendant Integra LifeSciences Corporation to be served via ECF to all registered parties and upon Integra LifeSciences Corporation in accordance with Local Rule 83.4(c)(2).

s/ Andrew J. Barber

Andrew J. Barber